

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

Case No. 20-30663

The Roman Catholic Diocese of Syracuse,
New York,

Chapter 11

Debtor.

Judge Wendy A. Kinsella

**MONTHLY FEE STATEMENT OF BURNS BAIR LLP FOR COMPENSATION OF
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS
SPECIAL INSURANCE COUNSEL FOR THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR THE PERIOD OF
JUNE 1, 2023 THROUGH JUNE 30, 2023**

Pursuant to the Court's *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and Members of Official Committees* [ECF No. 117] (the "Interim Compensation Order"), Burns Bair LLP, special insurance counsel for the Official Committee of Unsecured Creditors (the "Committee"), hereby files this monthly fee statement (the "Monthly Fee Statement") seeking compensation for reasonable and necessary services rendered to the Committee from June 1, 2023 through June 30, 2023 (the "Compensation Period") in the amount of \$40,113.20 (80% of \$50,141.50) and reimbursement of actual and necessary expenses incurred during the Compensation Period in the amount of \$3,617.40.

Burns Bair LLP's invoice for the Compensation Period, attached hereto as **Exhibit A**, includes detailed time entries that describe the services performed by Burns Bair LLP professionals during the Compensation Period and a list of expenses Burns Bair LLP incurred during the Compensation Period in connection with providing services to the Committee.

[Signature page follows]

Date: July 21, 2023

/s/ Timothy W. Burns

Timothy W. Burns (WI State Bar #1068086)

Jesse J. Bair (WI State Bar #1083779)

10 E. Doty St., Suite 600

Madison, Wisconsin 53703-3392

Telephone: (608) 286-2808

Email: tburns@burnsbair.com

Email: jbair@burnsbair.com

*Special Insurance Counsel for the Official
Committee of Unsecured Creditors*

EXHIBIT A

Burns | Bair

10 E. Doty St., Suite 600
Madison, Wisconsin 53703-3392
608-286-2302
www.BurnsBair.com

**Official Committee of Unsecured Creditors of
the Diocese of Syracuse, New York**

Issue Date : 7/20/2023

Bill # : 01166

Matter: Insurance

PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
6/1/2023	Jesse Bair	Prepare for insurance meeting with the Diocese (.1); correspondence with J. Murray and T. Burns re same (.1);	0.20	\$125.00
6/6/2023	Timothy Burns	Participate in call with Stinson team and J. Bair re insurance case developments and next-steps (.2); follow-up analysis in connection with same (.1);	0.30	\$210.00
6/6/2023	Jesse Bair	Listen to voice-message from Diocese counsel re insurance meeting (.1); correspondence with the Diocese re same (.1);	0.20	\$125.00
6/6/2023	Jesse Bair	Participate in call with Stinson team and T. Burns re insurance case developments and next-steps (.2);	0.20	\$125.00
6/7/2023	Jesse Bair	Correspondence with J. Murray re meeting to discuss case insurance issues (.1);	0.10	\$62.50
6/7/2023	Leakhena Au	Review and send follow up research regarding number of occurrences issue (.2);	0.20	\$84.00
6/7/2023	Timothy Burns	Conference with J. Bair re settlement efforts (.1); reviewed correspondence from J. Bair to opposing counsel re same (.1); reviewed additional correspondence re settlement discussions (.1); responded to correspondence re upcoming mediation (.1);	0.40	\$280.00
6/10/2023	Timothy Burns	Reviewed email from L. Kugler re pre-mediation Committee meeting (.1);	0.10	\$70.00
6/10/2023	Jesse Bair	Review L. Kugler correspondence re upcoming Committee meeting (.1);	0.10	\$62.50
6/10/2023	Jesse Bair	Correspondence with L. Kugler re adjourned hearing on next round of Committee interim fee applications (.1);	0.10	\$62.50
6/12/2023	Timothy Burns	Participate in call with R. Kugler re Arrowood issues (.4); post-call with J. Bair re same (.1);	0.50	\$350.00
6/12/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood issues and strategy (.1); additional analysis re strategy in connection with same (.1);	0.20	\$125.00

6/13/2023	Timothy Burns	Participate in additional call with R. Kugler re Arrowood strategy (.2); participate in call with J. Bair re same (.1);	0.30	\$210.00
6/13/2023	Jesse Bair	Participate in call with T. Burns re Arrowood strategy (.1);	0.10	\$62.50
6/13/2023	Jesse Bair	Draft revised insurance overview and summary materials for use during upcoming mediation (.6);	0.60	\$375.00
6/14/2023	Jesse Bair	Participate in call with T. Burns re Delaware mandamus proceedings against Arrowood (.2);	0.20	\$125.00
6/14/2023	Jesse Bair	Participate in call with T. Burns re case developments and insurance strategy for upcoming mediation (.2);	0.20	\$125.00
6/14/2023	Timothy Burns	Detailed review of Arrowood materials from writ of mandamus proceeding filed against Arrowood in Delaware and unfair claims practices action filed against Arrowood in North Carolina (2.6); participate in call with J. Bair re re same (.2); participate in call with R. Kugler re insurance developments and call from the Diocese (.2); participate in call with J. Bair re same (.2); work and analysis in connection with Arrowood regulatory issues and supervision of Arrowood by Delaware insurance commissioner (.8);	4.00	\$2,800.00
6/15/2023	Timothy Burns	Participate in call with state court counsel re insurance mediation and case strategy (.2); participate in call with R. Kugler re same (.2); participate in call with J. Bair re same (.1);	0.50	\$350.00
6/15/2023	Jesse Bair	Participate in call with T. Burns re insurance mediation and case strategy (.1);	0.10	\$62.50
6/19/2023	Timothy Burns	Additional analysis in connection with Arrowood regulatory issues and supervision of Arrowood by Delaware insurance commissioner (.3); correspondence with J. Bair and state court counsel re Arrowood claims count (.1);	0.40	\$280.00
6/19/2023	Jesse Bair	Analysis re Arrowood claim count (.1); correspondence with T. Burns re same (.1);	0.20	\$125.00
6/20/2023	Timothy Burns	Participate in conference with J. Bair re mediation strategy and Arrowood issues (.2);	0.20	\$140.00
6/20/2023	Jesse Bair	Participate in conference with T. Burns re mediation strategy and Arrowood issues (.2);	0.20	\$125.00
6/20/2023	Jesse Bair	Additional analysis of insurer exposures in advance of upcoming mediation (.2); correspondence with Stinson team re insurance overview (.1);	0.30	\$187.50
6/21/2023	Timothy Burns	Review and respond to correspondence from Diocese re insurance meeting (.2); participate in call with state court counsel re same (.2); participate in call with R. Kugler re same (.2);	0.60	\$420.00
6/21/2023	Jesse Bair	Review correspondence with the Diocese re meeting to discuss case insurance issues (.1);	0.10	\$62.50
6/21/2023	Jesse Bair	Begin preparations for upcoming mediation (.1);	0.10	\$62.50
6/22/2023	Timothy Burns	Review and acted on correspondence from the Diocese re insurance meeting (.1); review J. Bair's insurance settlement overview (.1);	0.20	\$140.00

6/22/2023	Jesse Bair	Review correspondence with state court counsel re insurance mediation issues (.1);	0.10	\$62.50
6/23/2023	Jesse Bair	Participate in conference with T. Burns re insurance mediation strategy (.1);	0.10	\$62.50
6/23/2023	Jesse Bair	Participate in conference with T. Burns re preparations for upcoming Committee meeting (.1); participate in call with R. Kugler and T. Burns re same and case developments (.2);	0.30	\$187.50
6/23/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re mediation strategy (.8);	0.80	\$500.00
6/23/2023	Jesse Bair	Participate in call with the Diocese, parish counsel, T. Burns, and R. Kugler re case insurance issues (.7); participate in post call with R. Kugler and T. Burns re same and next-steps (.4);	1.10	\$687.50
6/23/2023	Timothy Burns	Participate in conference with J. Bair re insurance mediation strategy (.1); participate in additional conference with J. Bair re upcoming Committee meeting (.1); participate in call with J. Bair and R. Kugler re same and case developments (.2); participate in Committee meeting re insurance mediation strategy (.8); participate in call with Debtor and parish counsel re case insurance issues (.7); participate in post call with R. Kugler and J. Bair re insurance next steps (.4); additional insurance analysis in preparation for upcoming mediation (.1);	2.40	\$1,680.00
6/24/2023	Jesse Bair	Analysis re Committee insurance interventions issues (.5); correspondence with L. Au re same and drafting Committee intervention issues (.2);	0.70	\$437.50
6/26/2023	Leakhena Au	Draft Committee motion to intervene in the insurance adversary proceeding (5.1);	5.10	\$2,142.00
6/26/2023	Timothy Burns	Participate in conference with J. Bair re mediation preparations, overall insurance strategy, and next-steps (.3);	0.30	\$210.00
6/26/2023	Jesse Bair	Travel to Syracuse from Madison for mediation [billed at 1/2 travel rate] (7.3);	7.30	\$2,281.25
6/26/2023	Jesse Bair	Participate in conference with T. Burns re mediation preparations, overall insurance strategy, and next-steps (.3);	0.30	\$187.50
6/26/2023	Timothy Burns	Travel to mediation in Syracuse from Madison [billed at 1/2 travel rate] (7.5);	7.50	\$2,625.00
6/27/2023	Nathan Kuenzi	Analysis re coverage and valuation issues in connection with preparing insurance demand letters on TNCRRG and Catholic Mutual (.8);	0.80	\$336.00
6/27/2023	Timothy Burns	Prepare for mediation with J. Bair (.3); participate in full-day mediation session (9.8);	10.10	\$7,070.00
6/27/2023	Jesse Bair	Participate in full-day mediation session (9.8);	9.80	\$6,125.00
6/27/2023	Jesse Bair	Correspondence with Claro re revised insurer claim count (.1);	0.10	\$62.50
6/27/2023	Jesse Bair	Additional analysis re Catholic Mutual exposure (.1); provide instructions to L. Au re drafting Catholic Mutual insurance demands (.2);	0.30	\$187.50

6/27/2023	Jesse Bair	Prepare for day 2 mediation session with T. Burns (.3);	0.30	\$187.50
6/27/2023	Leakhena Au	Draft proposed order for Committee motion to intervene (1.3);	1.30	\$546.00
6/28/2023	Jesse Bair	Participate in day 2 of mediation session (6.8);	6.80	\$4,250.00
6/28/2023	Jesse Bair	Return travel from Syracuse mediation to Madison [billed at 1/2 travel rate] (7.1);	7.10	\$2,218.75
6/28/2023	Alyssa Turgeon	Assist L. Au with drafting insurance demand letters on TNCRRG and Catholic Mutual (1.5);	1.50	\$540.00
6/28/2023	Leakhena Au	Draft insurance demand letters on TNCRRG and Catholic Mutual (4.3);	4.30	\$1,806.00
6/28/2023	Timothy Burns	Participate in day 2 of mediation session (6.8);	6.80	\$4,760.00
6/28/2023	Timothy Burns	Return travel to Madison from Syracuse mediation [billed at 1/2 travel rate] (7.1);	7.10	\$2,485.00
6/29/2023	Jesse Bair	Analyze Claro presentation re CVA claims valuation issues (.2); answer Claro question re Travelers exposure issue (.1); additional analysis re insurer claim count (.1);	0.40	\$250.00
6/29/2023	Jesse Bair	Additional analysis re potential Travelers demand letters (.2);	0.20	\$125.00
6/29/2023	Jesse Bair	Analysis re insurance next-steps in light of recent mediation session outcome (.2);	0.20	\$125.00
6/29/2023	Timothy Burns	Review correspondence with BB team and Claro re claims valuation (.2); review correspondence with BB team re insurance demand letters (.2); review claims data spreadsheet from Claro (.1);	0.50	\$350.00
6/30/2023	Timothy Burns	Exchange correspondence with the mediator re Arrowood issues (.1);	0.10	\$70.00
6/30/2023	Jesse Bair	Review and respond to correspondence with state court counsel re TNCRRG settlement issues (.2);	0.20	\$125.00
6/30/2023	Jesse Bair	Review correspondence with the Committee and state court counsel re mediation and litigation next-steps (.1);	0.10	\$62.50
6/30/2023	Jesse Bair	Review correspondence with the mediator re Arrowood claim monitor issues (.1);	0.10	\$62.50
Total Hours and Fees			95.00	\$50,141.50

EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/26/2023	Delta Airlines, T. Burns (MSN-SYR June 26-28)	\$1,276.40
6/26/2023	Hotel, T. Burns (2 nights)	\$521.36
6/26/2023	Hotel, J. Bair (2 nights)	\$521.36
6/26/2023	Travel meal, J. Bair and T. Burns	\$73.32
6/26/2023	Delta WiFi Onboard, J. Bair	\$4.95
6/26/2023	Uber, J. Bair (airport to hotel)	\$79.53
6/26/2023	Travel meal, T. Burns	\$9.45
6/26/2023	Delta Airlines, J. Bair (MSN-SYR June 26-28)	\$1,026.40
6/28/2023	Travel meal, T. Burns	\$20.94
6/28/2023	Travel meal, T. Burns	\$21.10

6/28/2023	Travel meal, J. Bair	\$12.00
6/28/2023	Travel meal, J. Bair	\$20.59
6/28/2023	Airport parking, J. Bair	\$30.00
Total Expenses		\$3,617.40

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Alyssa Turgeon	1.50	\$360.00	\$540.00
Jesse Bair	14.40	\$312.50	\$4,500.00
Jesse Bair	25.10	\$625.00	\$15,687.50
Leakhena Au	10.90	\$420.00	\$4,578.00
Nathan Kuenzi	0.80	\$420.00	\$336.00
Timothy Burns	14.60	\$350.00	\$5,110.00
Timothy Burns	27.70	\$700.00	\$19,390.00

Total Due This Invoice: \$53,758.90

CERTIFICATE OF SERVICE

I, Jess Rehbein, hereby certify that on July 21, 2023, I caused a true and correct copy of the foregoing to be filed with the Clerk of Court using CM/ECF and that service was emailed to the following parties:

- a. The Roman Catholic Diocese of Syracuse, New York, 240 East Onondaga Street,
Syracuse, New York 13202
- b. Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202,
Attn: Stephen A. Donato
- c. Office of the United States Trustee, 10 Broad Street, Room 105, Utica, New York
13501, Attn: Erin P. Champion

Date: July 21, 2023

/s/ Jess Rehbein

Jess Rehbein